



# California Regional Water Quality Control Board

## Central Coast Region



**Terry Tamminen**  
*Secretary for  
Environmental  
Protection*

Internet Address: <http://www.swrcb.ca.gov/rwqcb3>  
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**Arnold Schwarzenegger**  
*Governor*

March 11, 2004

Mr. Richard W. McClure  
Olin Corporation  
Environmental Remediation Group  
PO Box 248  
Charleston, TN 37310-0248

Mr. Jay McLaughlin  
President and CEO  
Standard Fusee Corporation  
PO Box 1047  
Easton, MD 21601

Dear Messrs. McClure and Mr. McLaughlin:

**SLIC: 425 TENNANT AVENUE, MORGAN HILL; LETTER FROM JAY BASKA, CITY OF GILROY, CONCERNING SOUTHERN EXTENT OF THE PERCHLORATE PLUME AND REQUEST TO ASSESS THREAT TO CITY WATER SUPPLY WELLS**

Regional Board staff have received a letter dated March 2, 2004, from Mr. Jay Baska, City Administrator Gilroy, that outlines the City's concerns and requests related to the perchlorate plume and its proximity to their supply wells. We are aware that Olin officials have been working with City staff on related matters and have attached the subject letter for your review and response. The City is concerned that the perchlorate plume's southern extent has not been adequately characterized especially in the vicinity of Levesley and 10<sup>th</sup> Street. As you are aware, City supply wells 5, 7 and 8/8A are located in this area and supply almost 60% of the City's water supply. As such, protection of these wells is of immediate importance to the City.

We share the City's concerns regarding groundwater characterization near its supply wells. We ask that you provide a written response on how you have, are, or plan to address the concerns and requests raised in Mr. Baska's letter by **April 14, 2004**. As stated in Mr. Baska's letter, the City is willing to meet with Olin regarding related issues. We encourage Olin to continue to meet with the City to discuss and resolve all related matters. We are also willing to meet with you and the City, if a joint meeting would be beneficial.

Pursuant to Section 13267 of the California Water Code, you are required to provide the above-requested information or technical justification for not including it, by April 14, 2004. Failure to submit adequate or complete information may subject you to a Regional Board enforcement action. The Regional Board requires you to submit your response in accordance with Section 13267 of the Water Code to determine the concentrations and movement of the perchlorate plume in the vicinity of the Olin site. We require you to submit the information as the current and former owner of the property, and as one of the previous operators of a flare manufacturing facility that caused soil and groundwater

***California Environmental Protection Agency***



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March 11, 2004

perchlorate contamination at and in the vicinity of the Olin site at 425 Tennant Avenue, Morgan Hill.

Any person affected by this action of the Regional Board may petition the State Water Resources Control Board (State Board) to review the action in accordance with section 13320 of the California Water Code and Title 23, California Code of Regulations, Section 2050. The State Board must receive the petition within 30 days of the date of this order. Copies of the law and regulations applicable to filing petitions will be provided upon request.

Should you have any questions, please contact **David Athey at (805) 542-4644** or Eric Gobler at (805) 549-3467.

Sincerely,



Roger W. Briggs  
Executive Officer

Enclosures:

- 1) City of Gilroy letter dated March 2, 2004

cc via E-mail:

Lori Okun  
Office of the Chief Counsel  
State Water Resources Control  
Board

Jim Ashcraft  
City of Morgan Hill

Rich Chandler  
Komex

Peter Forest  
San Martin County Water

Steven L. Hoch  
Hatch & Parent

Bill O'Braitis  
MACTEC

Sylvia Hamilton  
PCAG

Mr. Tom Mohr  
Santa Clara Valley Water District

PCAG Members

Elected Officials

U.S. Environmental Protection  
Agency

***California Environmental Protection Agency***

cc via U.S. Mail:

Jay Baska  
City of Gilroy  
7351 Rosanna Street  
Gilroy, CA 95020-6197

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Suwanee, GA 30024

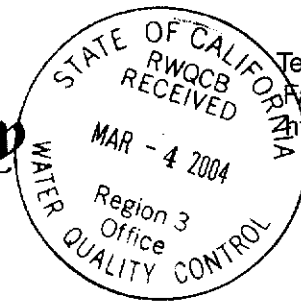
Mr. Richard Peekema  
4817 Wellington Park Dr.  
San Jose, CA 95136

S:\SLIC\Regulated Sites\Santa Clara Co\Olin\OLIN-425 TENNANT AVENUE\COMMUNICATIONS - RICK McCLURE\Gilroy Supply  
Well Letter.doc



# City of Gilroy

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Gilroy, California  
95020-6197



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**JAY BAKSA**  
CITY ADMINISTRATOR

Mr. Eric Gobler  
Regional Water Quality Control Board  
895 Aerovista Place  
Suite 101  
San Luis Obispo, CA 93401-7906

March 2, 2004

Dear Mr. Gobler:

The City of Gilroy remains extremely concerned about the continued lack of action by Olin to characterize the southern extent of the perchlorate plume and assess the threat to the City of Gilroy's water supply wells. The City of Gilroy has raised these concerns directly and through correspondence from the SCVWD repeatedly since April of 2003.

At this time, the only action that has occurred at the southern edge of the plume is the testing of the existing wells, including private wells, and the City's water supply and monitoring wells. In particular, the need for depth discrete sentry/monitoring wells in the proximity of the City's water production wells has been frequently identified as critical to the characterization of the plume. There is a significant gap in data, and few existing wells available for testing, in the area between Holsclaw Road and several of the City's wells, which is of the greatest concern to the City. (See the circled area on the attached map.)

Currently, there remains a nearly complete lack of technical understanding of the southern extent of the plume, as well as the magnitude, and rate of migration of the perchlorate contamination emanating from the Olin site, particularly in the vicinity of the City's wells 5, 7, and 8/8A (located near Highway 101, between Leavesley and 10<sup>th</sup> Street.) Given that these wells collectively represent nearly 60% of our production capacity, the impact of perchlorate contamination of these wells is of great concern.

As expressed at the February 13, 2004 meeting with the RWQCB and representatives of local agencies, Olin has not provided the RWQCB or the City with sufficient information regarding the perchlorate plume in the vicinity of, or past our wells. Recent discussions with Olin did not give us any assurances such information is forthcoming. Additionally, based on what was verbally relayed from the RWQCB, we understand that it is Olin's position that the existing methodology of using private wells to monitor plume location and migration is sufficient. We strongly disagree.

Domestic water supply wells are typically much shallower than municipal water supply wells and are pumped at much lower rates. Perchlorate-impacted groundwater may migrate through discrete zones that bypass existing wells or are deeper than existing wells. In addition, the long screen length of domestic water supply wells may allow perchlorate to go undetected. As stated in Regional Board correspondence to Olin dated February 19, 2004, "...California guidance recommends that monitoring well screen lengths should not usually exceed 10 feet in length." A properly designed sentry well network is critical to protect the City of Gilroy's water supply. We believe it is imperative that Olin immediately perform the steps outlined below with the City as a "partner" in each step:

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- 1) Provide all water level, perchlorate concentration, water quality and well screen information regarding private wells Olin has sampled or has results for, south of Buena Vista Avenue.
- 2) Develop and implement a work plan for the characterization of the full lateral and vertical extent of perchlorate groundwater contamination and hydraulic gradient conditions upgradient, in the vicinity of, and downgradient of the City's Wells 5, 7 and 8/8A. This plan should include ongoing monitoring of water levels and groundwater chemistry until Olin has remediated the plume to background levels. This work plan should include installation of short-screened multiple-level monitoring wells, at no less than 10 locations. No less than five locations should be situated across the axis of the plume in the vicinity of, or along Animas or Buena Vista Avenues, upgradient of our wells, while five should be located cross-or downgradient of our wells and between Highway 101 and our western wells. At least five discretely screened monitoring wells should be installed at each location from the total depth of the City's wells to the top of the uppermost aquifer. Detailed geological data, including borehole geophysics should be collected at all locations in order to understand not only the contaminant distribution, but to identify preferential flowpaths.
- 3) Based on data collected from plume characterization and in consultation with the City, Olin should be directed to install, maintain, monitor and sample a network of sentry wells to provide the City with warning of contamination moving towards its wells. This is necessary so that adequate measures can be taken to prevent well contamination, mobilize protective treatment, or so the City can develop a strategy to limit impacts to the City's drinking water resources.

The work outlined above is primarily focused on identifying the most imminent threat to the City's water resources. There is a significant amount of other characterization that will be necessary for Olin to address threats to the City's water resources and to remediate the contamination it has caused, but especially given recent communications, it is necessary to highlight this most critical concern. The City of Gilroy remains open and available to discuss this issue with the Regional Board staff and Olin representatives.

Sincerely,

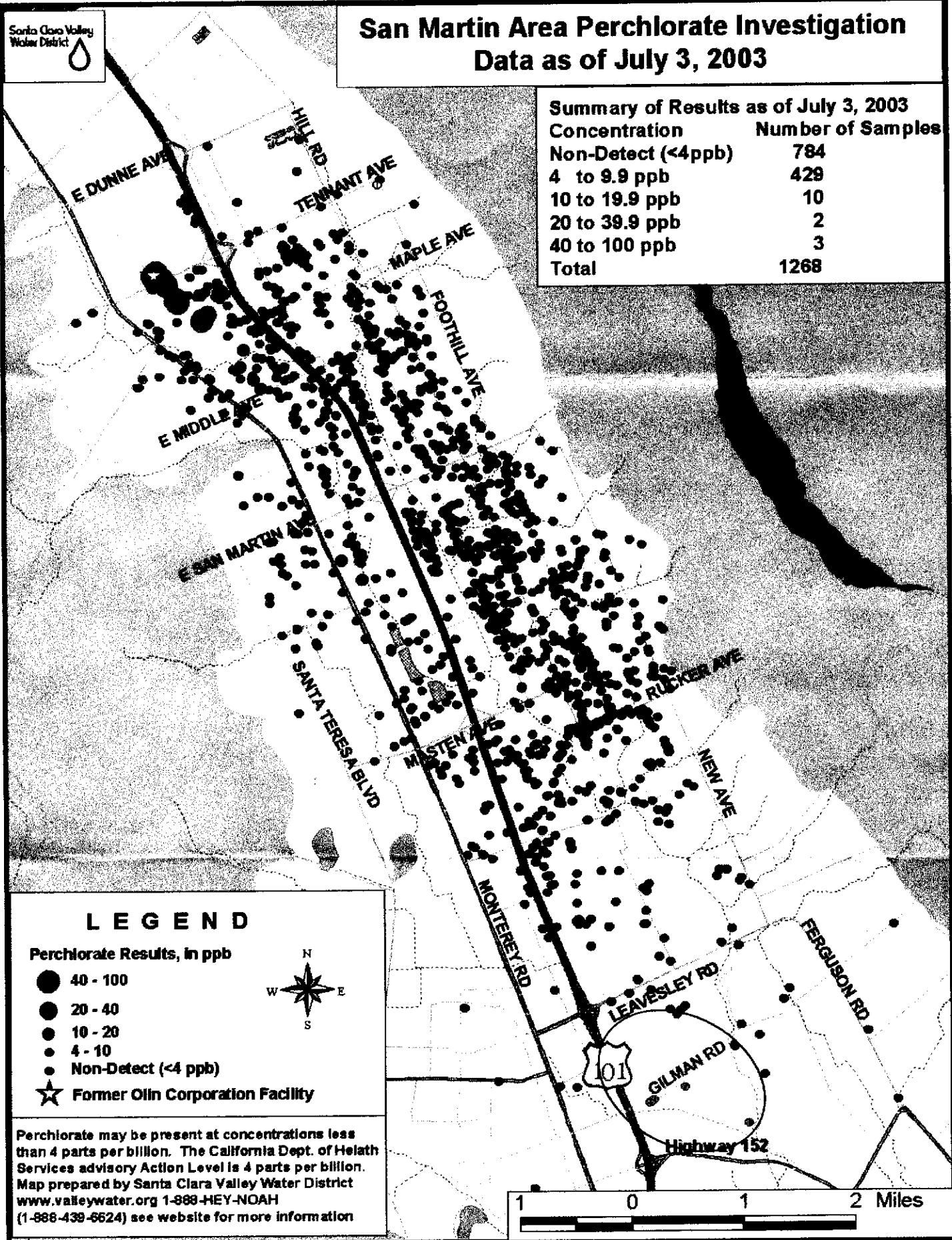


Jay Baksa  
City Administrator

# San Martin Area Perchlorate Investigation Data as of July 3, 2003

## Summary of Results as of July 3, 2003

Concentration	Number of Samples
Non-Detect (<4ppb)	784
4 to 9.9 ppb	429
10 to 19.9 ppb	10
20 to 39.9 ppb	2
40 to 100 ppb	3
<b>Total</b>	<b>1268</b>



## LEGEND

### Perchlorate Results, in ppb

● 40 - 100

● 20 - 40

● 10 - 20

● 4 - 10

● Non-Detect (<4 ppb)

★ Former Olin Corporation Facility



Perchlorate may be present at concentrations less than 4 parts per billion. The California Dept. of Health Services advisory Action Level is 4 parts per billion. Map prepared by Santa Clara Valley Water District [www.valleywater.org](http://www.valleywater.org) 1-888-HEY-NOAH (1-888-439-6624) see website for more information

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